

Exhibit 17

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30 to 33

<p style="text-align: right;">Page 30</p> <p>1 - BENJAMIN WILSON -</p> <p>2 GE Oil & Gas; is that correct?</p> <p>3 A. Correct.</p> <p>4 Q. And in what role did you join GE</p> <p>5 Oil & Gas?</p> <p>6 A. Chief Technology Officer.</p> <p>7 Q. Were you the sole Chief Technology</p> <p>8 Officer of GE Oil & Gas or were there other Chief</p> <p>9 Technology Officers as well?</p> <p>10 A. I was Chief Technology Officer. I</p> <p>11 had people who used that the term -- the --</p> <p>12 the -- the word Chief Technology Officer of like</p> <p>13 operations and so forth who worked for me.</p> <p>14 Q. And to whom did you report?</p> <p>15 A. I reported to the CIO.</p> <p>16 Q. And how large was the team you</p> <p>17 managed?</p> <p>18 MR. GAGE: Objection.</p> <p>19 A. Contractors and employees, more than</p> <p>20 1,000.</p> <p>21 Q. Do you know how many employees?</p> <p>22 A. More than 500. I -- I -- I would</p> <p>23 have to go look at notes to know the exact number.</p> <p>24 Q. And at the time you were working for</p> <p>25 GE, was the technology Cloud-based?</p>	<p style="text-align: right;">Page 32</p> <p>1 - BENJAMIN WILSON -</p> <p>2 THE WITNESS: I'm sorry, Ken,</p> <p>3 I'm -- I'm -- I'm unclear on how to answer</p> <p>4 this question.</p> <p>5 MR. GAGE: If you don't understand</p> <p>6 the question, that's all you need to say.</p> <p>7 A. I --</p> <p>8 Q. I can reframe.</p> <p>9 A. I'm not trying to be difficult. I</p> <p>10 apologize. It's --</p> <p>11 Q. Sure.</p> <p>12 A. -- this is not a question that you</p> <p>13 can answer in a yes or no.</p> <p>14 Q. Were there still aspects of GE</p> <p>15 Oil & Gas that were data-center based?</p> <p>16 A. Yes.</p> <p>17 MR. GAGE: Objection.</p> <p>18 Q. Did you work with an -- a company</p> <p>19 outside of GE with respect to Cloud-based hosting</p> <p>20 or services?</p> <p>21 A. Yes.</p> <p>22 Q. And what company did you work with?</p> <p>23 A. Pardon me. As it says in the resume</p> <p>24 in the first line, "Amazon Web Services."</p> <p>25 And -- and, I'm sorry, there were</p>
<p style="text-align: right;">Page 31</p> <p>1 - BENJAMIN WILSON -</p> <p>2 A. No.</p> <p>3 Q. In any of the roles that you had held</p> <p>4 prior to Google, in any of those roles was the</p> <p>5 technology Cloud-based?</p> <p>6 A. So at GE, I brought GE to the Cloud.</p> <p>7 So we were not Cloud-based when we started; we</p> <p>8 were when we -- we were done.</p> <p>9 Q. And --</p> <p>10 A. Same thing as PQ; they were not</p> <p>11 Cloud-based, but I brought them to be -- I'll</p> <p>12 repeat the entire answer again for clarity.</p> <p>13 At GE, they were not Cloud-based;</p> <p>14 they were data-center based. I brought them to</p> <p>15 Cloud, that was my job. When I moved to P2 Energy</p> <p>16 Solutions, they were also data-center based and I</p> <p>17 moved them to Cloud.</p> <p>18 Q. Did you complete the transformation</p> <p>19 from data center to Cloud while at GE?</p> <p>20 MR. GAGE: Objection.</p> <p>21 A. Define "complete."</p> <p>22 Q. Was it the -- the move from data</p> <p>23 center to Cloud, was that completed, finished or</p> <p>24 was it still underway when you left?</p> <p>25 MR. GAGE: Objection.</p>	<p style="text-align: right;">Page 33</p> <p>1 - BENJAMIN WILSON -</p> <p>2 multiple companies I worked with. You asked what</p> <p>3 companies, there were multiple. I don't know all</p> <p>4 the names, but the provider Cloud was AWS.</p> <p>5 Q. Okay. Prior to working for Google</p> <p>6 Cloud, had you worked with Google Cloud in any of</p> <p>7 your prior positions?</p> <p>8 A. Well, that would be impossible since</p> <p>9 Google Cloud didn't really exist until -- I -- I</p> <p>10 don't know what year that entity actually existed,</p> <p>11 so that would be hard for me to answer.</p> <p>12 Q. So, again, just so we have a clear</p> <p>13 record: Is the answer that no, you hadn't worked</p> <p>14 with Google Cloud prior to joining Google Cloud?</p> <p>15 MR. GAGE: Objection.</p> <p>16 A. Yes, that is correct.</p> <p>17 Q. Okay. You can put that document</p> <p>18 aside.</p> <p>19 A. Done.</p> <p>20 Q. With respect to your position at GE,</p> <p>21 do you recall what your total annual compensation</p> <p>22 was in the last full year you worked for the</p> <p>23 company?</p> <p>24 A. No.</p> <p>25 Q. Do you recall whether it was more</p>

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74 to 77

<p style="text-align: right;">Page 74</p> <p style="text-align: center;">- BENJAMIN WILSON -</p> <p>1 Q. And what did Mr. Grannis say to you?</p> <p>2 A. I -- I -- I can't remember precisely.</p> <p>3 Q. Do you remember anything about what</p> <p>4 he said to you?</p> <p>5 A. He said it was not likely I'd become</p> <p>6 the head of the vertical as they were looking for</p> <p>7 another persona of a person than who I was. Also</p> <p>8 that Tariq was a different leader than -- than</p> <p>9 others and he had his ideas of who he wants in</p> <p>10 that role, and he looked at myself as a technical</p> <p>11 person who should stay technical rather than going</p> <p>12 and leading the vertical. That's the best of my</p> <p>13 recollection.</p> <p>14 Q. Did you discuss it at all with Brian</p> <p>15 Stevens?</p> <p>16 A. I don't recall. If I did, it was</p> <p>17 minor.</p> <p>18 Q. Do you know if Will Grannis discussed</p> <p>19 it with Brian Stevens?</p> <p>20 A. I do not know.</p> <p>21 Q. Do you know whether Will Grannis or</p> <p>22 Brian Stevens asked that you be considered for</p> <p>23 that role?</p> <p>24 A. I -- I just -- I don't know.</p> <p>25</p>	<p style="text-align: right;">Page 76</p> <p style="text-align: center;">- BENJAMIN WILSON -</p> <p>1 document to demonstrate areas we could go and</p> <p>2 penetrate from a -- and the market perspective.</p> <p>3 He looked at it, liked it, asked for a copy, and</p> <p>4 if I recall correctly his phone rang and that was</p> <p>5 the end of the conversation.</p> <p>6 Q. Was this before or after you learned</p> <p>7 that you would be moving into his organization?</p> <p>8 A. I -- I don't recall. It was -- it</p> <p>9 was a very fluid time and it was unclear if I was</p> <p>10 going or when I was going, so I -- I just don't</p> <p>11 know.</p> <p>12 Q. Do you know whether Google was</p> <p>13 verticalizing any other industry verticals at the</p> <p>14 same time it was moving forward with Energy?</p> <p>15 A. Yes.</p> <p>16 Q. What did you know?</p> <p>17 A. They had picked a number of</p> <p>18 industries that they thought they could do well</p> <p>19 in, Energy being -- oil and gas it was called at</p> <p>20 that time was one of them, financial services,</p> <p>21 healthcare, media and entertainment. I -- I just</p> <p>22 can't recall the others off the top of my head.</p> <p>23 Q. Was Ms. Rowe the one who had</p> <p>24 experience in financial services?</p> <p>25</p>
<p style="text-align: right;">Page 75</p> <p style="text-align: center;">- BENJAMIN WILSON -</p> <p>1 Q. Were you ever interviewed for the</p> <p>2 role?</p> <p>3 A. I'm sorry about this answer, but the</p> <p>4 answer is I'm not sure.</p> <p>5 Q. You're not sure, what do you mean by</p> <p>6 that?</p> <p>7 A. It was -- I had a meeting with Tariq.</p> <p>8 My impression was it was an interview for the</p> <p>9 role, but it was -- it turned out not to be an</p> <p>10 interview meeting.</p> <p>11 Q. When was that meeting?</p> <p>12 A. Before Darryl Willis was hired. I</p> <p>13 don't recall the exact date.</p> <p>14 Q. Tell me what you recall about that</p> <p>15 meeting.</p> <p>16 A. I was surprised it was not an</p> <p>17 interview.</p> <p>18 Q. How did you know it was not an</p> <p>19 interview; what about the meeting suggested it was</p> <p>20 not an interview?</p> <p>21 A. He never asked a question about an</p> <p>22 interview. It was conversation about things</p> <p>23 unrelated to work, and the one moment we had</p> <p>24 talked about something about work I presented a</p> <p>25</p>	<p style="text-align: right;">Page 77</p> <p style="text-align: center;">- BENJAMIN WILSON -</p> <p>1 A. Yes.</p> <p>2 Q. Was she operating as the -- as the</p> <p>3 person in OCTO with responsibilities as to the</p> <p>4 financial services vertical?</p> <p>5 A. Yes.</p> <p>6 Q. And so was she essentially sort of</p> <p>7 your corollary for financial services?</p> <p>8 A. Yes.</p> <p>9 Q. Did you know of anyone at Google in</p> <p>10 Cloud who had more experience in financial</p> <p>11 services?</p> <p>12 MR. GAGE: Objection.</p> <p>13 A. I didn't know everyone in Cloud, so I</p> <p>14 was -- I was not -- I mean, I was not aware, but I</p> <p>15 didn't know everyone in Cloud.</p> <p>16 Q. Did you consider her to be the go-to</p> <p>17 person with respect to financial services?</p> <p>18 A. Yes.</p> <p>19 MR. GAGE: Objection.</p> <p>20 Q. Did Mr. Eryurek have any particular</p> <p>21 vertical experience -- in any particular vertical,</p> <p>22 I should say?</p> <p>23 A. Yes. He was the CTO of the GE</p> <p>24 Medical, so he was in the medical vertical as I</p> <p>25</p>

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90 to 93

<p style="text-align: right;">Page 90</p> <p>1 - BENJAMIN WILSON -</p> <p>2 candidates might look like?</p> <p>3 A. People in HR, Will, people who were</p> <p>4 doing the interviews. I really couldn't give you</p> <p>5 a specific name, but generally speaking there</p> <p>6 was -- you showed a job description, generally</p> <p>7 speaking that -- those job descriptions are kind</p> <p>8 of what they were looking for, so it's very</p> <p>9 consistent.</p> <p>10 Q. So the job description that we looked</p> <p>11 at earlier you're saying is consistent with what</p> <p>12 was described to you about who Google was looking</p> <p>13 for for these positions?</p> <p>14 A. Yes. One thing I would just mention</p> <p>15 again is in terms of the machine learning and</p> <p>16 AIPs, that was not a necessity for everyone.</p> <p>17 Scott Penberthy was an exception to that because</p> <p>18 he is one, but generally speaking you didn't have</p> <p>19 to have that particular experience; but everything</p> <p>20 else in there was generally understood as the</p> <p>21 capabilities or experience you had to have to be</p> <p>22 in the office of the CTO.</p> <p>23 Q. At any point in time in describing</p> <p>24 for you what experience, et cetera needed to be in</p> <p>25 the office -- to be in the office of the CTO, did</p>	<p style="text-align: right;">Page 92</p> <p>1 - BENJAMIN WILSON -</p> <p>2 Q. What was your understanding of her</p> <p>3 background?</p> <p>4 A. A deep financial services background,</p> <p>5 working with C-level executives, go and build out</p> <p>6 financial products customers would use.</p> <p>7 Q. Do you know how many years of</p> <p>8 financial services industry experience she had?</p> <p>9 A. No.</p> <p>10 Q. Was that something that was kind of a</p> <p>11 topic of discussion in OCTO, the number of years</p> <p>12 of experience that people had?</p> <p>13 MR. GAGE: Objection.</p> <p>14 A. Not as far as I knew.</p> <p>15 Q. Did you know what her educational</p> <p>16 background was?</p> <p>17 MR. GAGE: Objection.</p> <p>18 A. I knew she had an CS degree, that was</p> <p>19 about it.</p> <p>20 Q. Do you know whether she had a</p> <p>21 Master's?</p> <p>22 A. I believe -- like I believe she does</p> <p>23 have a Master's and I believe I know that so, yes,</p> <p>24 I guess I knew that somewhere along the time.</p> <p>25 Q. Do you know if she had been in the</p>
<p style="text-align: right;">Page 91</p> <p>1 - BENJAMIN WILSON -</p> <p>2 anyone mention to you levels?</p> <p>3 A. Never.</p> <p>4 MR. GAGE: Objection.</p> <p>5 A. Levels -- levels were never</p> <p>6 discussed.</p> <p>7 Q. During the time that you were in the</p> <p>8 office of the CTO, did you ever work with Ms.</p> <p>9 Rowe?</p> <p>10 A. Yes.</p> <p>11 Q. In -- in what capacity did you have a</p> <p>12 chance to work with her?</p> <p>13 A. Just things on like presentations and</p> <p>14 so forth. If I was giving a presentation, I would</p> <p>15 look for her advice on like what she's presented.</p> <p>16 She was a prolific presenter on behalf of Google,</p> <p>17 I was not, so I looked to her on kind of like what</p> <p>18 she presented on and how she did it and what were</p> <p>19 the things Google was looking for us to present</p> <p>20 on.</p> <p>21 Q. What was your understanding of what</p> <p>22 Ms. Ro -- Rowe's role was at that time when you</p> <p>23 were both in CTO?</p> <p>24 A. Same as mine, but for the financial</p> <p>25 vertical.</p>	<p style="text-align: right;">Page 93</p> <p>1 - BENJAMIN WILSON -</p> <p>2 CTO role prior to coming to Google?</p> <p>3 A. In the first year and a half or so, I</p> <p>4 -- I -- I didn't know, I was novice. You know,</p> <p>5 she's -- I know her better.</p> <p>6 I know that she had not been a kind</p> <p>7 of, if you will, officially titled CTO in the</p> <p>8 past.</p> <p>9 Q. During the time that you were working</p> <p>10 together though, that was not something that was</p> <p>11 discussed?</p> <p>12 MR. GAGE: Objection.</p> <p>13 A. No, there was no reason to discuss</p> <p>14 it.</p> <p>15 I'm sorry, I -- the cat, he is in</p> <p>16 here and he's irritating me. I will be back in a</p> <p>17 minute.</p> <p>18 Q. Sure.</p> <p>19 A. For the record, the cat's name is</p> <p>20 Crush.</p> <p>21 Q. Very good.</p> <p>22 A. Sorry.</p> <p>23 Q. In your interaction with Ms. Rowe,</p> <p>24 did find her to be professional?</p> <p>25 A. Yes.</p>

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102 to 105

<p style="text-align: right;">Page 102</p> <p>1 - BENJAMIN WILSON -</p> <p>2 earlier that you're hungry. We can break now</p> <p>3 for lunch if it's not too early or we could</p> <p>4 go for another fifteen or twenty minutes and</p> <p>5 then break. What's your preference?</p> <p>6 THE WITNESS: Let's go another</p> <p>7 fifteen -- oh, I'm sorry. Go ahead, counsel.</p> <p>8 MR. GAGE: No, no, that's okay. We</p> <p>9 can go another fifteen minutes. Why don't we</p> <p>10 go -- let's go to, you know, 1:00 or shortly</p> <p>11 after 1:00 Eastern.</p> <p>12 THE WITNESS: That sounds great.</p> <p>13 Q. In your role -- well, let me -- let</p> <p>14 me pause for a minute. Give me just one moment.</p> <p>15 At some point in time, did you come</p> <p>16 to learn that Mr. Grannis was considering</p> <p>17 reorganizing his group?</p> <p>18 MR. GAGE: Objection.</p> <p>19 A. Reorganizing at Google happens all</p> <p>20 the time, so that was always something that was</p> <p>21 on - it was a potential so, yes, I did understand</p> <p>22 that there were times he was thinking about</p> <p>23 organizing his group. It -- generally speaking it</p> <p>24 never really impacted me, so it was not something</p> <p>25 I knew very much about.</p>	<p style="text-align: right;">Page 104</p> <p>1 - BENJAMIN WILSON -</p> <p>2 be in the way to go do that. We never really</p> <p>3 talked about like organizational structure, who</p> <p>4 would be in charge, or anything like that. It was</p> <p>5 more around what the go-to market strategy would</p> <p>6 look like.</p> <p>7 Q. Did you have an understanding of who</p> <p>8 would be included in that verticals group?</p> <p>9 A. Those people would have a</p> <p>10 specialization in a vertical like myself.</p> <p>11 Q. And just for the purposes of the</p> <p>12 record, who were those individuals?</p> <p>13 A. Well, at the time I think it was just</p> <p>14 going to be Evren, me, and Ulku. Yeah, I think</p> <p>15 I -- if -- yeah, I think -- I don't think there</p> <p>16 was anyone else. I'd have to -- I'd have to think</p> <p>17 about it. I don't believe there was anyone else</p> <p>18 at that time.</p> <p>19 Q. How long were you in your role in</p> <p>20 OCTO?</p> <p>21 A. They probably have a better record</p> <p>22 than I did. Eighteen, twenty months.</p> <p>23 Q. And, again, just for the purpose of</p> <p>24 the record: During the time that you were in</p> <p>25 OCTO, did you have the same role for the entirety</p>
<p style="text-align: right;">Page 103</p> <p>1 - BENJAMIN WILSON -</p> <p>2 Q. At some point in time did you learn</p> <p>3 or come to learn that he was creating functional</p> <p>4 groups underneath him, one of which would be a</p> <p>5 verticals group?</p> <p>6 A. Yes.</p> <p>7 MR. GAGE: Objection.</p> <p>8 A. Yes, I did know that.</p> <p>9 Q. And did you come to learn that as</p> <p>10 part of this new reorganization, Ms. Rowe would be</p> <p>11 the leader of the verticals group under Mr.</p> <p>12 Grannis?</p> <p>13 A. No.</p> <p>14 MR. GAGE: Objection, leading.</p> <p>15 THE WITNESS: Oh, sorry, I'm speaking</p> <p>16 too quickly.</p> <p>17 A. No, I was -- I'd never heard that.</p> <p>18 Q. What was discussed with you about the</p> <p>19 creation of a verticals group under Mr. Grannis?</p> <p>20 MR. GAGE: Objection.</p> <p>21 A. I'm not even sure -- I'm not sure I</p> <p>22 ever heard it put in those terms, but I've heard</p> <p>23 the term where there's potential putting together</p> <p>24 a verticals group to go -- free to go to market</p> <p>25 strategy and that there are some things that might</p>	<p style="text-align: right;">Page 105</p> <p>1 - BENJAMIN WILSON -</p> <p>2 of that time?</p> <p>3 A. Yes.</p> <p>4 Q. And what were your day-to-day</p> <p>5 responsibilities in that position?</p> <p>6 A. Go help customers adopt Cloud, go</p> <p>7 help partners adopt Cloud -- I am so sorry. Go</p> <p>8 and help customers adopt Cloud. Go and help</p> <p>9 partners adopt Cloud. At Google Cloud, figure out</p> <p>10 what new products need to be built and for us</p> <p>11 three months I worked on some M&A work, M&A being</p> <p>12 Mergers and Acquisitions.</p> <p>13 Q. During what period of time did you</p> <p>14 work on M&A work?</p> <p>15 A. When I first joined. I mean, I</p> <p>16 believe that's 2017. I would say April, 2017</p> <p>17 through like August or something like that. It --</p> <p>18 it was for a three or four-month period and that</p> <p>19 was all.</p> <p>20 Q. Have you ever heard your role in OCTO</p> <p>21 described as having three pillars?</p> <p>22 A. Well, tell me the pillars and I might</p> <p>23 be able to tell you. I -- I -- I -- I think yes.</p> <p>24 I -- I don't really recall what the pillars were.</p> <p>25 Like one is service to the customer of course, one</p>

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106 to 109

<p style="text-align: right;">Page 106</p> <p>1 - BENJAMIN WILSON -</p> <p>2 is building new products which is -- was something</p> <p>3 else that kind of came up, but -- I recall three</p> <p>4 pillars, but I don't recall their names.</p> <p>5 Q. Okay. Was one customer-related work?</p> <p>6 A. Yes.</p> <p>7 Q. One influencing the platform and</p> <p>8 product?</p> <p>9 A. Yes, that was the second one I</p> <p>10 mentioned.</p> <p>11 Q. And one speaking and evangelism?</p> <p>12 A. Yes.</p> <p>13 Q. Did the role require travel?</p> <p>14 A. Yes.</p> <p>15 Q. Was that true of -- of all the</p> <p>16 directors in OCTO?</p> <p>17 A. Yes, as far as I know. I -- I think</p> <p>18 every one of them traveled.</p> <p>19 Q. Did the role -- I'm sorry, I didn't</p> <p>20 mean to cut you off.</p> <p>21 A. Yes, they traveled extensively.</p> <p>22 Q. Did the role involve or require</p> <p>23 meeting with customers?</p> <p>24 A. Yes.</p> <p>25 Q. Was that true of all of the technical</p>	<p style="text-align: right;">Page 108</p> <p>1 - BENJAMIN WILSON -</p> <p>2 A. Yes. I mean, Christopher, Jonathan,</p> <p>3 Jen, Paul. Yeah, all -- all of those -- Evren,</p> <p>4 Ulku, yes.</p> <p>5 Q. Okay.</p> <p>6 MS. GREENE: Well, I know we're a few</p> <p>7 minutes short, but I'm about to go into a new</p> <p>8 area of testimony so this is a good place for</p> <p>9 us to break for lunch.</p> <p>10 Let's take 45 minutes. Is that good</p> <p>11 for everyone?</p> <p>12 MR. GAGE: We'll come back at 1 --</p> <p>13 roughly 1:45 Eastern.</p> <p>14 MS. GREENE: Do you want to take us</p> <p>15 off the record, Darrak.</p> <p>16 THE VIDEOGRAPHER: Going off the</p> <p>17 record, the time is 12:57 p.m. New York time.</p> <p>18 (Whereupon, a lunch break was taken</p> <p>19 from 12:57 p.m. to 1:50 p.m.)</p> <p>20 THE VIDEOGRAPHER: The time is 1:50</p> <p>21 p.m. New York time, we're back on the record.</p> <p>22 Q. Welcome back. I wanted to start by</p> <p>23 talking about the move into Mr. Shaukat's</p> <p>24 organization. Did there come a time when you</p> <p>25 moved out of OCTO?</p>
<p style="text-align: right;">Page 107</p> <p>1 - BENJAMIN WILSON -</p> <p>2 directors in OCTO?</p> <p>3 A. As far as I know, yes.</p> <p>4 Q. Did the role require or involve</p> <p>5 engaging with other teams across Google?</p> <p>6 A. Yes.</p> <p>7 Q. Was that true of all the technical</p> <p>8 directors in OCTO?</p> <p>9 A. Yes.</p> <p>10 Q. What were the other teams with which</p> <p>11 you would engage?</p> <p>12 A. So technical account management,</p> <p>13 customer engineers, product managers, product</p> <p>14 engineering, support. I mean, a lot of the rest</p> <p>15 of Google Cloud.</p> <p>16 Q. And were the other technical</p> <p>17 directors in OCTO engaging with those same sort of</p> <p>18 teams?</p> <p>19 MR. GAGE: Objection.</p> <p>20 A. The ones I associated with and I knew</p> <p>21 their work, yes.</p> <p>22 Q. And the ones you associated and knew</p> <p>23 their -- their work, those are the one you've</p> <p>24 mentioned in previous answers?</p> <p>25 MR. GAGE: Objection.</p>	<p style="text-align: right;">Page 109</p> <p>1 - BENJAMIN WILSON -</p> <p>2 A. Yes, that was the time I moved out of</p> <p>3 OCTO.</p> <p>4 Q. And -- and when was that; when did</p> <p>5 you learn that you were moving out of OCTO?</p> <p>6 A. I'm not sure I could tell you an</p> <p>7 exact date. I mean, it was roughly 18 months into</p> <p>8 my career there so 2000 -- mid-2018 I would think,</p> <p>9 but I'm not exactly certain.</p> <p>10 Q. And how did you learn that was</p> <p>11 happening?</p> <p>12 A. I learned it over time. There was</p> <p>13 some rumors going around and then eventually there</p> <p>14 was a meeting with Will and all of us who were</p> <p>15 being moved over, and we were told that we were</p> <p>16 going to move into Tariq's organization.</p> <p>17 Q. And so you said "all of us" would</p> <p>18 being moved over, who was the "all of us"?</p> <p>19 A. I believe Jeff -- I -- Ulku, Evren,</p> <p>20 and myself for sure. I believe Jeff Kember was</p> <p>21 there, but I'm -- I'm trying to think about who</p> <p>22 was in that room. I -- I believe Jeff was there</p> <p>23 also.</p> <p>24 Q. With respect to Evren, what -- what</p> <p>25 did you know about his background?</p>

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118 to 121

<p style="text-align: right;">Page 118</p> <p>1 - BENJAMIN WILSON -</p> <p>2 lead?</p> <p>3 A. Yes.</p> <p>4 Q. Did you have any understanding as to</p> <p>5 what distinguished those three roles from each</p> <p>6 other?</p> <p>7 A. It was not clear to me.</p> <p>8 Q. At any point in time, did you have an</p> <p>9 understanding as to what distinguished those three</p> <p>10 roles from each other?</p> <p>11 A. Up until they disbanded the team, it</p> <p>12 was still unclear.</p> <p>13 Q. Up until --</p> <p>14 A. Just to me. Just to me, so I'll</p> <p>15 qualify it.</p> <p>16 Q. Up until they -- up until the team</p> <p>17 was disbanded, from your observations those roles</p> <p>18 appeared to be overlapping?</p> <p>19 A. Yes.</p> <p>20 Q. All right. Was there any discussion</p> <p>21 with Mr. Shaukat about the differences between the</p> <p>22 global client lead and the global client technical</p> <p>23 lead?</p> <p>24 MR. GAGE: Objection.</p> <p>25 A. I did not personally have a</p>	<p style="text-align: right;">Page 120</p> <p>1 - BENJAMIN WILSON -</p> <p>2 A. It was more about what we thought the</p> <p>3 role was going to be and what it should be and</p> <p>4 what our responsibilities are and so forth. I</p> <p>5 think there was a general -- I think he and I both</p> <p>6 felt the same way, is there was a general</p> <p>7 pigeonholing of the -- of the global client</p> <p>8 technical leads into something very specific that</p> <p>9 really was not -- that we were both trying to</p> <p>10 understand, I think is the best way to put it.</p> <p>11 Q. In Mr. Shaukat's organization, were</p> <p>12 you an individual contributor?</p> <p>13 A. Yes.</p> <p>14 Q. Was that for the entirety of the time</p> <p>15 you were in Mr. Shaukat's organization?</p> <p>16 A. Yes.</p> <p>17 Q. Did you have any conversations with</p> <p>18 Ms. Rowe regarding the role or responsibilities of</p> <p>19 the global client technical lead?</p> <p>20 A. Yes.</p> <p>21 Q. What did you discuss with her?</p> <p>22 A. I think we both discussed the fact it</p> <p>23 was a very unclear role and it was difficult to --</p> <p>24 to determine what success looked like.</p> <p>25 Q. So based on your conversations with</p>
<p style="text-align: right;">Page 119</p> <p>1 - BENJAMIN WILSON -</p> <p>2 conversation with him about that.</p> <p>3 Q. Did anyone ever explain to you what</p> <p>4 the difference was between those two roles?</p> <p>5 MR. GAGE: Objection.</p> <p>6 A. Yes. Darryl Willis tried to explain</p> <p>7 the difference, but I was left with the impression</p> <p>8 he was confused also.</p> <p>9 Q. Do you recall what Mr. Willis told</p> <p>10 you?</p> <p>11 A. Since he and I were senior people</p> <p>12 in the organization our thought was that we were</p> <p>13 just going to say yes, sir, a little bit</p> <p>14 overlapping, but our goal is go serve the customer</p> <p>15 and so we should work together and find a way to</p> <p>16 go serve the customers with each one of our</p> <p>17 capabilities and do that to the best of our</p> <p>18 ability. That was what we settled on, not a</p> <p>19 specific set of role of who does what.</p> <p>20 Q. Did you have any discussions with Mr.</p> <p>21 Eryurek around the role of the global client</p> <p>22 technical lead?</p> <p>23 A. Well, um, yes.</p> <p>24 Q. What discussions did you have with</p> <p>25 Evren?</p>	<p style="text-align: right;">Page 121</p> <p>1 - BENJAMIN WILSON -</p> <p>2 Ms. Rowe, did it seem that within the financial</p> <p>3 services vertical there was the same sort of</p> <p>4 overlap that existed within the Energy vertical?</p> <p>5 A. Yes.</p> <p>6 MR. GAGE: Objection.</p> <p>7 THE WITNESS: Sorry.</p> <p>8 A. Yes.</p> <p>9 Q. And with respect to your</p> <p>10 conversations with Mr. Ery -- Eryurek, did it also</p> <p>11 seem to you that the -- he was having the same</p> <p>12 sort of issues with respect to overlapping roles</p> <p>13 in Health that you were having in Energy?</p> <p>14 MR. GAGE: Objection.</p> <p>15 A. That was a more mature organization</p> <p>16 and they had rough -- I -- I can't remember the</p> <p>17 number, more than 25 people. So because they had</p> <p>18 more people, it was clear what kind of the roles</p> <p>19 and responsibilities would be.</p> <p>20 Also they had a different mission</p> <p>21 coming into the org working for Tariq, so I think</p> <p>22 it was easier for them to define it. So it wasn't</p> <p>23 as -- it didn't stand out as much.</p> <p>24 Q. Did you know any of the people in the</p> <p>25 global client lead role?</p>

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126 to 129

<p style="text-align: right;">Page 126</p> <p>1 - BENJAMIN WILSON -</p> <p>2 MR. GAGE: Objection.</p> <p>3 A. Could you repeat the question?</p> <p>4 Q. Okay. Is this what was being</p> <p>5 communicated with respect to your role under Mr.</p> <p>6 Shaukat at the time you made the move from OCTO?</p> <p>7 MR. GAGE: Objection.</p> <p>8 A. A hundred percent, no. More than</p> <p>9 eighty-five percent, yes.</p> <p>10 Q. Meaning it's eighty-five percent</p> <p>11 accurate, is that right; is that what you're</p> <p>12 saying?</p> <p>13 A. I mean I --</p> <p>14 MR. GAGE: Objection.</p> <p>15 THE WITNESS: Sorry.</p> <p>16 A. What -- what I would say is it's --</p> <p>17 it's hard to make it black and white because it</p> <p>18 was an evolving organization and there was an</p> <p>19 understanding that we were going to have a</p> <p>20 leadership role in this kind of new vertical</p> <p>21 organization.</p> <p>22 And I think that when this came out,</p> <p>23 there was -- it -- it kind of pigeonholed us into</p> <p>24 a smaller leadership role, which was a surprise to</p> <p>25 us.</p>	<p style="text-align: right;">Page 128</p> <p>1 - BENJAMIN WILSON -</p> <p>2 back and check.</p> <p>3 Q. So at a point in time -- well, when</p> <p>4 you first moved into Mr. Shaukat's organization,</p> <p>5 were you reporting directly to him?</p> <p>6 A. To Tariq?</p> <p>7 Q. Yes.</p> <p>8 A. No, I was not reporting directly to</p> <p>9 Tariq.</p> <p>10 Q. To whom were you reporting?</p> <p>11 A. Darryl.</p> <p>12 Q. And at that point in time Mr. Willis</p> <p>13 was the VP of Energy?</p> <p>14 A. Correct.</p> <p>15 Q. Okay. I would like to turn your</p> <p>16 attention to Tab 33 and we are marking as Exhibit</p> <p>17 122.</p> <p>18 MR. GAGE: Hold on for one second.</p> <p>19 For some reason, I don't have it yet.</p> <p>20 Tab 33, oh, there it is.</p> <p>21 MS. GREENE: Do you have it?</p> <p>22 MR. GAGE: Yes.</p> <p>23 MS. GREENE: Okay.</p> <p>24 Q. We're marking as Exhibit 122 the</p> <p>25 document Bates stamped GOOG-ROWE-00053848 through</p>
<p style="text-align: right;">Page 127</p> <p>1 - BENJAMIN WILSON -</p> <p>2 Q. So once you were actually in the</p> <p>3 role, what did your day-to-day responsibilities</p> <p>4 look like?</p> <p>5 A. I think they were pretty much</p> <p>6 unchanged.</p> <p>7 Q. Unchanged from the role in OCTO?</p> <p>8 A. Yes. I think that was due to the</p> <p>9 lack of clarity in the roles that we discussed</p> <p>10 earlier.</p> <p>11 Q. Okay. We can set that document</p> <p>12 aside.</p> <p>13 I want to switch gears for a moment</p> <p>14 and talk about your performance duties and</p> <p>15 compensation. First, 2017 do you recall who --</p> <p>16 who was your manager for purposes of your</p> <p>17 performance review?</p> <p>18 A. Will Grannis.</p> <p>19 Q. And what about with respect to 2018?</p> <p>20 A. I'd have to go look. I believe one</p> <p>21 was Will Grannis and the other one was Darryl</p> <p>22 Willis.</p> <p>23 Q. And what about with respect to 2019?</p> <p>24 A. Yeah, Darryl Willis. Darryl Willis</p> <p>25 and Dominick Richter maybe, yeah. I'd have to go</p>	<p style="text-align: right;">Page 129</p> <p>1 - BENJAMIN WILSON -</p> <p>2 851.</p> <p>3 (Whereupon, Exhibit 122 was marked at</p> <p>4 this time.)</p> <p>5 Q. Do you recognize this document?</p> <p>6 A. Yes.</p> <p>7 Q. And what do you recognize this to be?</p> <p>8 A. Performance evaluation.</p> <p>9 Q. Okay, and is this for Q3 of 2017?</p> <p>10 A. It appears to be. That's the date at</p> <p>11 the top.</p> <p>12 Q. And so at this time, Mr. Grannis was</p> <p>13 your manager; is that correct?</p> <p>14 A. It should say that. I believe so --</p> <p>15 yes, it is. He is my manager.</p> <p>16 Q. Okay, and what was your performance</p> <p>17 rating for 2017 Q3?</p> <p>18 A. "Consistently meets expectations."</p> <p>19 Q. And what was your understanding in</p> <p>20 terms of the -- the rating; is that 2 out of 5?</p> <p>21 A. Yes, that's 2 out of 5.</p> <p>22 Q. And 5 is the highest, correct?</p> <p>23 A. Correct.</p> <p>24 Q. What do you recall Mr. Grannis saying</p> <p>25 in the context of your performance rating for Q3</p>

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146 to 149

<p style="text-align: right;">Page 146</p> <p>1 - BENJAMIN WILSON -</p> <p>2 A. Yes.</p> <p>3 MR. GAGE: Objection.</p> <p>4 Q. What had she expressed to you?</p> <p>5 A. She felt he'd been unfair.</p> <p>6 Q. What do you recall her telling you</p> <p>7 about that?</p> <p>8 A. I recall there was several</p> <p>9 conversations around roles and responsibilities</p> <p>10 and leadership roles, and she felt that she could</p> <p>11 be the leader of the vertical and there had been</p> <p>12 quite a bit -- there's been turnover in that</p> <p>13 particular role and she felt that that was an</p> <p>14 opportunity for her to kind of do the things she's</p> <p>15 good at.</p> <p>16 Q. Anything else that you recall Ms.</p> <p>17 Rowe sharing with you or expressing to you?</p> <p>18 A. No. I mean -- I mean, she -- what</p> <p>19 she expressed to me was frustration and a feeling</p> <p>20 of unfairness in that it didn't feel like that she</p> <p>21 had the opportunity to actually kind of show what</p> <p>22 she's been able to go do. She felt like that role</p> <p>23 would be one way that she could go and do that.</p> <p>24 Q. Did she express that she did not feel</p> <p>25 that Mr. Shaukat was giving her fair</p>	<p style="text-align: right;">Page 148</p> <p>1 - BENJAMIN WILSON -</p> <p>2 THE WITNESS: I'm -- I'm sorry to</p> <p>3 everyone. I continue to answer too quickly.</p> <p>4 A. What I recall talking about is</p> <p>5 Tariq's staff meetings are useless, so she -- she</p> <p>6 was better off.</p> <p>7 Q. Were you at those staff meetings?</p> <p>8 A. No, I did not report to Tariq.</p> <p>9 Darryl was.</p> <p>10 Q. Did she share anything else with you</p> <p>11 with respect to Mr. Shaukat's treatment of her?</p> <p>12 MR. GAGE: Objection.</p> <p>13 A. No, I mean -- no, I mean, I -- I</p> <p>14 think that the two points of treatment, as you put</p> <p>15 it, were what I've already stated.</p> <p>16 Q. At some point in time, did you start</p> <p>17 to consider roles outside of Mr. Shaukat's</p> <p>18 organization?</p> <p>19 A. Yes. When Darryl came to me and said</p> <p>20 consider roles outside of Tariq's organization, I</p> <p>21 started considering roles outside of his</p> <p>22 organization.</p> <p>23 Q. And what roles did you -- did you</p> <p>24 look at to consider?</p> <p>25 A. There was a wide variety of roles in</p>
<p style="text-align: right;">Page 147</p> <p>1 - BENJAMIN WILSON -</p> <p>2 consideration?</p> <p>3 MR. GAGE: Objection.</p> <p>4 A. Yes, I think she did. I shared with</p> <p>5 her also that I felt the same way.</p> <p>6 Q. Did Ms. Rowe say anything to you with</p> <p>7 respect to her level in the conversation?</p> <p>8 A. I don't recall that being a point of</p> <p>9 conversation, but I couldn't swear to it. I just</p> <p>10 don't recall.</p> <p>11 Q. Did Ms. Rowe ev -- ever express to</p> <p>12 you that she felt that Mr. Shaukat was not</p> <p>13 inclusive of her?</p> <p>14 MR. GAGE: Objection.</p> <p>15 A. I can recall conversations where she</p> <p>16 had stated she wasn't -- she was kind of directly</p> <p>17 reporting to Tariq and she was not being included</p> <p>18 in staff meetings that she felt like she should be</p> <p>19 included in.</p> <p>20 Q. What do you recall being discussed</p> <p>21 about that?</p> <p>22 A. That Tariq's staff meeting --</p> <p>23 MR. GAGE: Objection.</p> <p>24 THE WITNESS: I'm sorry, Ken.</p> <p>25 MR. GAGE: It's all right.</p>	<p style="text-align: right;">Page 149</p> <p>1 - BENJAMIN WILSON -</p> <p>2 -- in Google. They were anything from something</p> <p>3 inside of sales and then inside of the internal IT</p> <p>4 organization called Corp. Eng. I don't really</p> <p>5 recall every single one. There were several that</p> <p>6 I went and looked at.</p> <p>7 Q. The roles inside of Corp. Eng, were</p> <p>8 those engineering roles?</p> <p>9 A. Yeah, they were engineering -- they</p> <p>10 were architectural roles which had a feature of</p> <p>11 engineering, yes.</p> <p>12 Q. Do you recall any other roles that</p> <p>13 you looked at?</p> <p>14 A. Off the top of my head, no.</p> <p>15 Q. Did you believe that you had the</p> <p>16 relevant skills for those roles you were looking</p> <p>17 at?</p> <p>18 A. Yes.</p> <p>19 Q. Did you believe you had the relevant</p> <p>20 experience for the roles that you were looking at?</p> <p>21 A. Yes.</p> <p>22 Q. Did you believe that you had the</p> <p>23 relevant qualifications for the roles that you</p> <p>24 were looking at?</p> <p>25 A. Yes.</p>

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150 to 153

<p style="text-align: right;">Page 150</p> <p>1 - BENJAMIN WILSON -</p> <p>2 MR. GAGE: Objection.</p> <p>3 A. The answer was yes.</p> <p>4 Q. Did you interview for any of those</p> <p>5 roles?</p> <p>6 A. Some, yes.</p> <p>7 Q. Do you recall what roles you</p> <p>8 interviewed for?</p> <p>9 A. One was for an new operating system</p> <p>10 and during the interview it became clear to me it</p> <p>11 was a very, very engineering-technical role that I</p> <p>12 was not capable of. That was one that stuck out.</p> <p>13 There were two others that weren't really a fit</p> <p>14 for my skill set. I just don't recall what they</p> <p>15 were.</p> <p>16 Understand -- so I think it's fair to</p> <p>17 say I live in Houston, Texas. I was not willing</p> <p>18 to move to Sunnyvale, which put a very small</p> <p>19 number of roles that I could take working out of</p> <p>20 Houston, Texas.</p> <p>21 Q. Were there roles in Sunnyvale that</p> <p>22 you believed yourself to be qualified and skilled</p> <p>23 to take?</p> <p>24 MR. GAGE: Objection.</p> <p>25 A. Yes, but I was unwilling to move to</p>	<p style="text-align: right;">Page 152</p> <p>1 - BENJAMIN WILSON -</p> <p>2 seen and identified in Sunnyvale, did you believe</p> <p>3 yourself to be qualified for those positions?</p> <p>4 MR. GAGE: Objection. Same</p> <p>5 objection. What positions are we talking</p> <p>6 about?</p> <p>7 THE WITNESS: I'm sorry, I'm unclear</p> <p>8 as whether I should answer the question.</p> <p>9 MR. GAGE: You can answer -- if you</p> <p>10 understand the question, you can answer it.</p> <p>11 I just don't understand the question. I</p> <p>12 don't know what positions you're talking</p> <p>13 about.</p> <p>14 A. I would -- I would answer the</p> <p>15 question this way: Generally I saw a lot of</p> <p>16 roles. The ones that I didn't apply for that were</p> <p>17 in Sunnyvale I thought, A, I had most of the</p> <p>18 qualifications. Generally speaking, that's what I</p> <p>19 would say.</p> <p>20 Q. So did you generally believe that</p> <p>21 your experience was widely transferable within</p> <p>22 Google at the director level?</p> <p>23 MR. GAGE: Objection.</p> <p>24 A. In some cases, yes; in some cases,</p> <p>25 no.</p>
<p style="text-align: right;">Page 151</p> <p>1 - BENJAMIN WILSON -</p> <p>2 Sunnyvale so I was not really able to go interview</p> <p>3 for those roles.</p> <p>4 Q. Do you recall any of the roles that</p> <p>5 you saw in Sunnyvale?</p> <p>6 A. No, I -- I don't. I mean --</p> <p>7 Q. Do you recall what kinds of roles</p> <p>8 they were, whether they were engineering or</p> <p>9 product management or project management or --</p> <p>10 A. They -- they were all of those</p> <p>11 things.</p> <p>12 Q. And did you believe that you were</p> <p>13 qualified and skilled for those roles, but you</p> <p>14 weren't willing to relocate; is that your</p> <p>15 testimony?</p> <p>16 MR. GAGE: Objection.</p> <p>17 A. My testimony is --</p> <p>18 MR. GAGE: Are -- are we talking</p> <p>19 about specific roles, specific times, and</p> <p>20 specific places or are we just speaking</p> <p>21 vaguely about whatever roles might be</p> <p>22 offered?</p> <p>23 MS. GREENE: Well, if you can limit</p> <p>24 your speaking objections, the question was:</p> <p>25 Q. With respect to the positions you had</p>	<p style="text-align: right;">Page 153</p> <p>1 - BENJAMIN WILSON -</p> <p>2 Q. In what cases yes?</p> <p>3 MR. GAGE: Objection.</p> <p>4 A. Where the roles fit into the job</p> <p>5 scope that I currently have or the job ladder that</p> <p>6 I had.</p> <p>7 Q. Did there come a time when you began</p> <p>8 to consider a project -- a product management</p> <p>9 role?</p> <p>10 A. Yes.</p> <p>11 Q. And when was that?</p> <p>12 A. Well, I mean, I have been working</p> <p>13 with product managers my entire time I was at</p> <p>14 Google and it felt like that was a good place to</p> <p>15 go; and so I talked about taking some roles with</p> <p>16 product management throughout that time.</p> <p>17 Eventually I found a role in Cloud Systems, which</p> <p>18 is the organization I'm in right now, where I'm</p> <p>19 trying to transfer to the product management</p> <p>20 ladder.</p> <p>21 Q. How did you come to learn of the</p> <p>22 product manager role in Cloud Systems?</p> <p>23 A. In the work I was doing to build a</p> <p>24 product called Active Assist, two or three people</p> <p>25 had mentioned they were looking for product</p>

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154 to 157

<p style="text-align: right;">Page 154</p> <p>1 - BENJAMIN WILSON -</p> <p>2 managers to help inside Cloud Systems. I went and</p> <p>3 spoke to a few people and it turned out that the</p> <p>4 answer was yes and so I took a chance there and</p> <p>5 did some interviews.</p> <p>6 Q. Did you ever see a job description</p> <p>7 for the product management role that you</p> <p>8 interviewed for?</p> <p>9 A. Yes. Eventually, yes, I did.</p> <p>10 Q. Okay, and do you recall what title</p> <p>11 that role had?</p> <p>12 A. I don't recall off the top of my head</p> <p>13 what -- what the precise title was.</p> <p>14 Q. What was your understanding of what</p> <p>15 the product management role entails?</p> <p>16 A. Coming up with a vision of where</p> <p>17 the product is going to go, to find a kind of</p> <p>18 three-year road map, and then going down to a</p> <p>19 yearlong road map with quarterly deliverables that</p> <p>20 drove an outcome that was positive for customers.</p> <p>21 Q. Did you believe that your skill set</p> <p>22 was transferable to that product management role?</p> <p>23 A. Given I had run product management</p> <p>24 organizations in my prior two companies, yes.</p> <p>25 Q. Was there any skills that you were</p>	<p style="text-align: right;">Page 156</p> <p>1 - BENJAMIN WILSON -</p> <p>2 until that point in time relevant to the product</p> <p>3 management role that you moved into?</p> <p>4 MR. GAGE: Objection.</p> <p>5 A. Yes. Basically we were building what</p> <p>6 I had built at GE and at P2 and we were building</p> <p>7 that for Cloud, so there was a direct</p> <p>8 applicability.</p> <p>9 Q. Did the product management role</p> <p>10 require that you identify AI-related design</p> <p>11 development or deployment friction points from the</p> <p>12 customer's perspective?</p> <p>13 MR. GAGE: Objection.</p> <p>14 A. Which role?</p> <p>15 Q. The product management role.</p> <p>16 A. Yes.</p> <p>17 Q. Did the product management role</p> <p>18 look to entail rallying teams to work through</p> <p>19 deployment hurdles, product updates, new product</p> <p>20 offerings, and solutions?</p> <p>21 MR. GAGE: Objection.</p> <p>22 A. Yes.</p> <p>23 Q. Did the product management role</p> <p>24 require you or entail working with customers and</p> <p>25 other partners on joint initiatives?</p>
<p style="text-align: right;">Page 155</p> <p>1 - BENJAMIN WILSON -</p> <p>2 using in the OCTO role or the client technical</p> <p>3 lead role that were transferable to the PM role?</p> <p>4 MR. GAGE: Objection.</p> <p>5 A. Yes, identifying gaps in our -- our</p> <p>6 product lines and features and functions that were</p> <p>7 missing.</p> <p>8 Q. Was there any aspect of the work that</p> <p>9 you had been doing in OCTO or Mr. Shaukat's</p> <p>10 organization that involved product management?</p> <p>11 MR. GAGE: Objection.</p> <p>12 A. Some. It was more being able to</p> <p>13 identify gaps in features. We were working with</p> <p>14 customers who were doing high-performance compute</p> <p>15 and we had some gaps in features and so we would</p> <p>16 identify those gaps and help our colleagues, you</p> <p>17 know, figure out how to solve them.</p> <p>18 Q. Did the product management role</p> <p>19 involve collaboration?</p> <p>20 A. Yes.</p> <p>21 Q. Was that also true with respect to</p> <p>22 the role that you had played up until that point</p> <p>23 in time?</p> <p>24 A. Yes.</p> <p>25 Q. Was your technology experience up</p>	<p style="text-align: right;">Page 157</p> <p>1 - BENJAMIN WILSON -</p> <p>2 A. Yes.</p> <p>3 Q. Did the product management role</p> <p>4 entail corroborating across functional and product</p> <p>5 area boundaries?</p> <p>6 A. Yes.</p> <p>7 Q. Did the product management role</p> <p>8 require you to work with broader Google</p> <p>9 engineering PMs and research teams?</p> <p>10 A. Yes.</p> <p>11 Q. Did the product management role</p> <p>12 require you to be able to do deep dives with the</p> <p>13 internal engineering team?</p> <p>14 A. Yes.</p> <p>15 Q. Did the product management role</p> <p>16 involve working on cross-Google technical working</p> <p>17 teams?</p> <p>18 A. Yes.</p> <p>19 Q. Did the product management role</p> <p>20 involve getting hands-on with customer projects?</p> <p>21 A. Generally, no.</p> <p>22 Q. Did the product management role</p> <p>23 involve defining and solving AI problems that</p> <p>24 spanned code, infrastructure, strategy business,</p> <p>25 and FUD?</p>

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<p style="text-align: right;">Page 158</p> <p>1 - BENJAMIN WILSON -</p> <p>2 A. I --</p> <p>3 MR. GAGE: Objection.</p> <p>4 A. I don't know what FUD is.</p> <p>5 Q. Putting aside FUD then, did the</p> <p>6 product management role involve defining and</p> <p>7 solving AI problems across code, infrastructure,</p> <p>8 strategy and business?</p> <p>9 A. In --</p> <p>10 MR. GAGE: Objection.</p> <p>11 A. In some cases, yes.</p> <p>12 Q. Did the product management role</p> <p>13 involve any private whiteboarding sessions?</p> <p>14 A. Yes.</p> <p>15 Q. Did the product management role</p> <p>16 involve any public evangelism?</p> <p>17 A. Yes.</p> <p>18 Q. Did the product management role</p> <p>19 require experience in designing, scoping, and</p> <p>20 delivering complex applications and services?</p> <p>21 MR. GAGE: Objection.</p> <p>22 A. No.</p> <p>23 Q. Did the product management role</p> <p>24 require experience with multiple software design</p> <p>25 methodologies?</p>	<p style="text-align: right;">Page 160</p> <p>1 - BENJAMIN WILSON -</p> <p>2 February, but for the first six months or so I was</p> <p>3 doing project management work to solve an urgent</p> <p>4 business problem; and then in I would say August,</p> <p>5 mid-August, I started functioning in the product</p> <p>6 management role, just so we're precise.</p> <p>7 Q. And so as of February, who did you</p> <p>8 report to?</p> <p>9 A. Initially, well, Ros -- Roslyn</p> <p>10 Litchfield.</p> <p>11 Q. And what is Ms. Litchfield's</p> <p>12 position?</p> <p>13 A. Senior director of product</p> <p>14 management.</p> <p>15 Q. And as of August, who did you report</p> <p>16 to?</p> <p>17 A. Same person; Roslyn Litchfield.</p> <p>18 Q. And, currently, who do you report to?</p> <p>19 A. We just made an org change. I'm now</p> <p>20 reporting to Eric Watson.</p> <p>21 Q. And is Eric Watson also on the</p> <p>22 product management ladder?</p> <p>23 A. Yes, he is.</p> <p>24 Q. And is there a reason why your ladder</p> <p>25 hasn't changed product management?</p>
<p style="text-align: right;">Page 159</p> <p>1 - BENJAMIN WILSON -</p> <p>2 A. Yes.</p> <p>3 Q. Did the product management role</p> <p>4 require an understanding of the challenges modern</p> <p>5 enterprises faced with respect to scale, speed,</p> <p>6 and user expectations?</p> <p>7 MR. GAGE: Objection.</p> <p>8 A. Yes.</p> <p>9 Q. When you moved into the product</p> <p>10 management role, did your level change?</p> <p>11 A. No.</p> <p>12 Q. What is your current level?</p> <p>13 A. I am still an L 9. My expectation is</p> <p>14 if I move into the product management role</p> <p>15 officially, I will be downgraded to an L 8.</p> <p>16 Q. So at this point in time, are you</p> <p>17 functioning in a product management position or</p> <p>18 are you functioning in the technical client lead</p> <p>19 position?</p> <p>20 A. Product management.</p> <p>21 Q. And how long have you been</p> <p>22 functioning in the product management position?</p> <p>23 A. Roughly six months.</p> <p>24 I -- I do need to provide a</p> <p>25 clarification to that. I started the role in</p>	<p style="text-align: right;">Page 161</p> <p>1 - BENJAMIN WILSON -</p> <p>2 MR. GAGE: Objection.</p> <p>3 A. Inside Google moving to the product</p> <p>4 management ladder requires lot -- lots of</p> <p>5 evaluations. It's stated that it's like -- it's</p> <p>6 going through a brand-new interview like you were</p> <p>7 a new employee -- rather or a non-Google employee</p> <p>8 and you have to go through -- I've been asked to</p> <p>9 go through a year of evaluation in the product</p> <p>10 management role.</p> <p>11 Q. Have you been give -- given any</p> <p>12 indication about whether you will move over to the</p> <p>13 product management ladder?</p> <p>14 A. No, not yet.</p> <p>15 Q. Is it your understanding that your</p> <p>16 role and responsibilities will continue as they</p> <p>17 are presently are if and when you do move over to</p> <p>18 the product management ladder?</p> <p>19 A. Yes.</p> <p>20 Q. And I think you may have testified</p> <p>21 that your understanding is that if and when you</p> <p>22 move over to the product management ladder, your</p> <p>23 level at that time may change; is that right?</p> <p>24 A. Yes. I would go from an L 9 to an</p> <p>25 L 8 would be my expectation.</p>